

Liza M. Walsh
Selina M. Ellis
Christine P. Clark
Walsh Pizzi O'Reilly Falanga LLP
Three Gateway Center
100 Mulberry Street, 15th Floor
Newark, NJ 07102
(973) 757-1100

*Attorneys for Plaintiffs
Teva Branded Pharmaceutical
R&D Inc. and Norton (Waterford) Ltd.*

Loly G. Tor
K&L Gates LLP
One Newark Center, 10th Floor
Newark, NJ 07102
(T) 973.848.4026
(F) 973.848.4001

*Attorney for Defendants Cipla USA, Inc. and
Cipla Ltd.*

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

TEVA BRANDED PHARMACEUTICAL
PRODUCTS R&D, INC., and
NORTON (WATERFORD) LTD.,

Plaintiffs,

v.

CIPLA USA, INC. and CIPLA LTD.,

Defendants.

Civil Action No. 24-909 (SRC)(MAH)
(consolidated)

Civil Action No. 24-5856 (SRC)(MAH)

Civil Action No. 24-7162 (SRC)(MAH)

**[PROPOSED] STIPULATED ELECTRONICALLY STORED
INFORMATION PROTOCOL**

Plaintiffs Teva Branded Pharmaceutical Products R&D, Inc. and Norton (Waterford) Ltd.
and Defendants Cipla USA, Inc. and Cipla Ltd. by their undersigned counsel, hereby stipulate
and agree as follows:

WHEREAS, the Court's Amended Scheduling Order requires the parties to meet and
confer on an appropriate electronically stored information ("ESI") protocol pursuant to Local
Civil Rule 26.1(d), and enter into a mutually acceptable protocol by September 30, 2024.

WHEREAS, the parties have met and conferred regarding the terms of a mutually acceptable protocol.

IT IS HEREBY ORDERED:

1. In producing ESI in connection with the above-captioned matters, the parties shall abide by paragraphs 1, 3, and 5 of the Default Standard for Discovery, Including Discovery of Electronically Stored Information (“ESI”) of the U.S. District Court for the District of Delaware (the “Default Standard”) (Exhibit A).

2. The parties shall exchange disclosures under paragraph 3 of the Default Standard on or before October 18, 2024.

STIPULATED AND AGREED TO BY:

By: s/ Loly G. Tor

Loly G. Tor (loly.tor@klgates.com)
K&L GATES LLP
One Newark Center, 10th Floor
Newark, NJ 07102
(T) 973.848.4026
(F) 973.848.4001

Of Counsel:

Anil H. Patel (anil.patel@klgates.com)
(*pro hac vice*)
K&L GATES LLP
609 Main Street, Suite 4150
Houston, TX 77002
(T) 713.815.7300
(F) 713.815.7301

Harold Storey (harold.storey@klgates.com)
(*pro hac vice*)
Elizabeth Weiskopf
(elizabeth.weiskopf@klgates.com)
(*pro hac vice*)

By: s/ Liza M. Walsh

Liza M. Walsh
Selina M. Ellis
Christine P. Clark
WALSH PIZZI O'REILLY FALANGA LLP
100 Mulberry Street, 15th Floor
Newark, New Jersey 07102
(973) 757-1100

OF COUNSEL:

David I. Berl
Benjamin M. Greenblum
Elise M. Baumgarten
Kathryn S. Kayali
Ben Picozzi
Ricardo Leyva
Richard Hildreth III
WILLIAMS & CONNOLLY LLP
680 Maine Avenue, S.W.
Washington, DC 20024
(202) 434-5000

Attorneys for Plaintiffs Teva Branded

K&L GATES LLP

925 Fourth Avenue, Suite 2900

Seattle, WA 98104

(T) 206.623.7580

(F) 206.623.7022

*Pharmaceutical Products R&D, Inc. and
Norton (Waterford) Ltd.**Attorneys for Defendants/Counterclaim-
Plaintiffs Cipla Ltd. and Cipla USA Inc.*

IT IS SO ORDERED.

Dated: _____

Hon. Michael A. Hammer, U.S.M.J.